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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, *et al.*, individually and  
on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING  
JOINT SUBMISSION IN RESPONSE TO  
DKT. 419 RE: SEALING PORTIONS OF  
FEBRUARY 22, 2022 ORDER ON JOINT  
DISCOVERY LETTER BRIEF (DKT. 418)**

Referral: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is the Parties' Joint Submission in Response to Dkt. 419 Re: Sealing Portions of the February 22, 2022 Order on the Parties' joint discovery letter brief re Plaintiffs' Rule 30(b)(6) deposition notices (Dkt. 418) ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document Sought to Be Sealed	Court's Ruling on Motions to Seal	Basis for Sealing Portion of Document
February 22, 2022 Order	GRANTED as to redacted portions at:  1:4, 1:8, 2:7, 3:15, 6:8-10, 6:13, 7:4, 7:7, 7:10, 7:12, 8:8, 15:5, 15:8, 15:10, 16:15, 17:4, 17:6, 21:11, 21:13-15, 22:3-4, 22:5, 22:7-9, 22:12, 23:3, 23:6, 23:13, 24:5, 25:10, 25:13, 25:15, 26:9-10, 27:10-11, 27:13, 27:15, 31:14, 32:6, 32:13	The information requested to be sealed contains Google's highly confidential and proprietary information, regarding highly sensitive features of Google's internal systems and operations, including details related to internal projects, identifiers, and cookies, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

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**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. SUSAN VAN KEULEN  
United States Magistrate Judge